

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL  
(Consolidated for pretrial purposes  
with 1:25-cv-00449-LJL)  
rel. 1:25-cv-00779-LJL

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, JENNIFER ABEL, an individual, and STEVE SAROWITZ, an individual,

Plaintiffs,

v.

BLAKE LIVELY, an individual, RYAN REYNOLDS, an individual, LESLIE SLOANE, an individual, VISION PR, INC., a New York corporation, and THE NEW YORK TIMES COMPANY, a New York corporation,

Defendants.

**DECLARATION OF JASON SUNSHINE IN OPPOSITION TO CONSOLIDATED  
DEFENDANT THE NEW YORK TIMES COMPANY'S MOTION TO DISMISS  
CONSOLIDATED PLAINTIFFS' FIRST AMENDED COMPLAINT**

I, Jason Sunshine, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an associate of Liner Freedman Taitelman + Cooley, LLP, attorneys for Consolidated Plaintiffs Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni (“Baldoni”), Jamey Heath (“Heath”), It Ends With Us Movie LLC (“IEWU”), Melissa Nathan (“Nathan”), Jennifer Abel (“Abel”), and Steve Sarowitz (“Sarowitz”) (collectively, the “Wayfarer Parties”) in the above-captioned matter.

2. I submit this declaration to annex documents relevant to the Wayfarer Parties’ opposition to the motion filed by Consolidated Defendant The New York Times Company (the “NYT”) to dismiss the Wayfarer Parties’ First Amended Complaint as against it (ECF No. 105).

3. Annexed as **Exhibit 1** is a certified transcript of a video entitled “The Waging of an Alleged Smear Campaign Against Blake Lively” published on the website of the *New York Times* on December 21, 2024 and narrated by Megan Twohey.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Los Angeles, CA  
March 14, 2025

By: /s/ Jason Sunshine  
JASON SUNSHINE